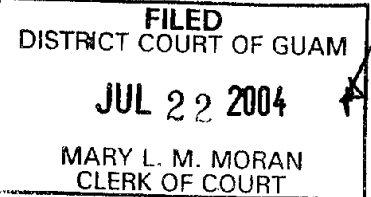


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Counsel for Plaintiffs Alan Sadhwani, et al.

IN THE UNITED STATES
DISTRICT COURT OF GUAM

ARRIOLA, COWAN & ARRIOLA, HAGATNA, GUAM 96910

ALAN SADHWANI, LAJU
SADHWANI, and K. SADHWANI'S
INC., a Guam corporation,
Plaintiffs,

vs.

HONGKONG AND SHANGHAI
BANKING CORPORATION, LTD., a
Foreign corporation, JOHN DOE I
through JOHN DOE X,
Defendants.

CIVIL CASE NO. 03-00036

DECLARATION OF
JACQUELINE T. TERLAJE

JACQUELINE T. TERLAJE, being duly sworn, depose and say:

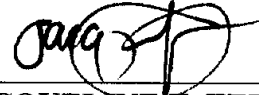
1. I am one of the attorneys for the plaintiffs Alan Sadhwani, et al. in the above-entitled case. I make this Declaration in support of Plaintiffs' Ex Parte Motion for Protective Order. I have personal knowledge of the facts contained herein.

2. The signature page of the "Declaration of Anita P. Arriola in Support of Ex Parte Motion for Protective Order" is a true and correct copy received by our office via facsimile on July 22, 2004, held as part of our records and attached as Exhibit 1 to this Declaration. Upon receipt of the original signature page, the document will be immediately filed with the Court.

ORIGINAL

I declare under penalty of perjury under the laws of the United States and the laws of Guam
that the foregoing is true and correct.

Dated this 22nd day of July, 2004.



JACQUELINE T. TERLAJE

6714779734

I declare under penalty of perjury under the laws of Guam and the United States that the foregoing is true and correct.

Dated this 22nd day of July, 2004.

Anita P. Arriola
ANITA P. ARRIOLA

ARRIOLA, ANITA P. ARRIOLA, HAGATNA, GUAM 96910

